

A. Michael Covino (AC 4352)
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MERRILL LYNCH BUSINESS	:	
FINANCIAL SERVICES, INC.,	:	Civil Action No. 06-Civ-4802(DMC)
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	PGB INTERNATIONAL, LLC'S RESPONSE
ARTHUR KUPPERMAN, E. ROSS	:	TO JP MORGAN CHASE'S LOCAL CIVIL
BROWNE, PAULETTE KRELMAN	:	RULE 56.1 STATEMENT OF MATERIAL
and PGB INTERNATIONAL, LLC,	:	FACTS AND THEIR OWN STATEMENT OF
	:	UNDISPUTED MATERIAL FACTS
Defendants.	:	

Pursuant to L.Civ.R. 56.1, Defendants PGB International LLC ("PGB") submits this Response to JP Morgan Chase's Statement of Undisputed Material Facts in opposition to JP Morgan Chase's cross-motion for partial summary judgment:

1. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 1.
2. PGB refers to the relevant documents for the contents thereof.
3. PGB refers to the relevant documents for the contents thereof.
4. PGB refers to the relevant documents for the contents thereof.

5. PGB refers to the relevant documents for the contents thereof.
6. PGB refers to the relevant documents for the contents thereof.
7. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 7.
8. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 8.
9. PGB refers to the relevant documents for the contents thereof.
10. PGB refers to the relevant documents for the contents thereof.
11. PGB refers to the relevant documents for the contents thereof.
12. PGB refers to the relevant documents for the contents thereof.
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16. PGB refers to the relevant documents for the contents thereof.
17. PGB refers to the relevant documents for the contents thereof.
18. PGB refers to the relevant documents for the contents thereof.

19. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 19.
20. PGB refers to the relevant documents for the contents thereof.
21. PGB refers to the relevant documents for the contents thereof.
22. PGB refers to the relevant documents for the contents thereof.
23. PGB refers to the relevant documents for the contents thereof.
24. PGB refers to the relevant documents for the contents thereof.
25. PGB refers to the relevant documents for the contents thereof.
26. PGB refers to the relevant documents for the contents thereof.
27. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 27.
28. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 28.
29. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 29.
30. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 30.
31. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 31.

32. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 32.
33. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 33.
34. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 34.
35. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 35.
36. PGB refers to the relevant documents for the contents thereof.
37. PGB refers to the relevant documents for the contents thereof.
38. PGB refers to the relevant documents for the contents thereof.
39. PGB denies knowledge or information sufficient to form a belief as to the statements contained in paragraph 39.
40. PGB admits this statement.
41. PGB refers to the relevant documents for the contents thereof.
42. PGB refers to the relevant documents for the contents thereof.
43. PGB refers to the relevant documents for the contents thereof.

44. PGB refers to the relevant documents for the contents thereof.


A. Michael Covino

Dated: December 26, 2006
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